

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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My Pillow, Inc., DBA MyPillow,

Case No. 21-cv-01015-PJS-DTS

Plaintiff,

v.

US DOMINION, INC., DOMINION  
VOTING SYSTEMS, INC., and  
DOMINION VOTING SYSTEMS  
CORPORATION,

Defendants.

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**DEFENDANTS' MOTION TO STAY, OR IN THE ALTERNATIVE, TO  
EXTEND THE RESPONSE DEADLINE**

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Defendants US Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation (collectively, "Defendants"), through their respective counsel, move this Court to enter a stay of this case until a ruling is issued in the D.C. Action on My Pillow's and Lindell's motions to dismiss or transfer, with the parties being required to provide the Court with a status report on the D.C. Action every 120 days.<sup>1</sup> Dominion also requests that the Court set the deadline for Dominion's response to My

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<sup>1</sup> By seeking to stay the case or extend deadlines pending motions being determined in the D.C. Action, Dominion does not waive and expressly preserves its defenses under Federal Rule of Civil Procedure 12(b), including the lack of personal jurisdiction and improper venue. *See, e.g., Murphy v. Labor Source, LLC*, Case No. 19-cv-1929, 2020 WL 3633234, at \*11 (D. Minn. Mar. 12, 2020); *see also Gerber v. Riordan*, 649 F.3d 514, 519 (6th Cir. 2011); *Lane v. XYZ Venture Partners, L.L.C.*, 332 F. App'x 675, 678 (11th Cir. 2009); *PaineWebber Inc. v. Chase Manhattan Private Bank (Switzerland)*, 260 F.3d 453, 461 (5th Cir. 2001); *Ciolfi v. Iravani*, 625 F. Supp. 2d 276, 291 (E.D. Pa. 2009).

Pillow's complaint to 30 days after the stay is lifted. In the alternative, Dominion asks the Court to at least extend the deadline to answer or otherwise respond to My Pillow's complaint to 30 days after the Court issues its order on the present motion.

As set forth in more detail in Defendants' Memorandum in Support of their Motion to Stay or, in the Alternative, to Extend the Response Deadline, good cause exists to grant this Motion, as a stay in this action pending resolution of My Pillow's motion to dismiss in the D.C. Action would preserve judicial resources, allow the Court to control its docket in light of a related case filed yesterday in the District of Minnesota by My Pillow's owner, and ensure the just disposition of the two Minnesota actions. This Motion is supported by the accompanying Memorandum in Support of Defendants' Motion to Stay or, in the Alternative, to Extend the Response Deadline, along with all the files, records, and proceedings herein.

Dated: June 4, 2021

**FAEGRE DRINKER BIDDLE &  
REATH LLP**

*s/ John W. Ursu*

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